

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

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: PROMESA
: Title III
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: Case No. 17-BK-3283 (LTS)
:
: (Jointly Administered)
:
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: X

**SECOND VERIFIED STATEMENT OF COHEN, WEISS AND SIMON LLP
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure and the Court's June 8, 2020 *Twelfth Amended Notice, Case Management and Administrative Procedures* order [Docket No. 13383-1], the law firm of Cohen, Weiss and Simon LLP ("CWS") gives notice of representation of more than one creditor in the above-captioned bankruptcy case, and states as follows:

1. CWS represents the following creditors in the above-captioned case:
 - (a) International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) ("UAW")
8000 East Jefferson Avenue
Detroit, MI 48214

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

(b) Service Employees International Union (“SEIU”)
1800 Massachusetts Avenue, NW
Washington, DC 20036

2. The UAW and SEIU (collectively “the Unions”) assert the following categories of disclosable economic interests on behalf of employees in bargaining units represented by them or by their local Puerto Rico affiliates: (1) against the Commonwealth: grievances, grievance settlements and arbitration awards related to breach of collective bargaining agreements and/or applicable labor and employment laws (estimated to be in the aggregate magnitude of between \$1 million and \$10 million), and (2) against the Commonwealth and against the Employees Retirement System: accrued pension obligations (in the aggregate magnitude of greater than \$10 million).

3. The Unions have had the disclosable economic interests described above on January 14, 2019 and on the date of this filing.

4. CWS has no disclosable economic interests of its own against any of the Title III Debtors.

5. CWS was engaged by the Unions in May 2017 at the instance of the Unions.

6. CWS reserves the right to amend this Verified Statement.

7. The undersigned verifies that the foregoing Verified Statement is true and accurate to the best of the undersigned’s knowledge, information, and belief.

Dated: June 26, 2020

Respectfully submitted,

/s/ *Peter D. DeChiara*

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Workers of America (UAW) and Service
Employees International Union

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of June 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will notify all counsel of record and caused to be mailed or emailed a copy, as provided in the Court-approved Case Management Procedures in this case.

Dated: June 26, 2020

/s/ Marie B. Hahn
Marie B. Hahn